

EXHIBIT 13

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

14 WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY
15
16 VIDEOTAPED DEPOSITION OF GREGORY KINTZ
17 SAN FRANCISCO, CALIFORNIA
18 WEDNESDAY, APRIL 26, 2017
19
20
21 BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~
22 CSR LICENSE NO. 9830
23 JOB NO. 2592507
24
25 PAGES 1 - 234

1 Q Now, the use of a [REDACTED] [REDACTED]
2 [REDACTED] that's known in the 17:22
3 public; right? 17:22

4 MR. JAFFE: Objection; form. 17:22

5 THE WITNESS: There are many applications of 17:22
6 [REDACTED] [REDACTED]
7 [REDACTED] [REDACTED]
8 [REDACTED] [REDACTED]
9 [REDACTED] 17:22

10 MR. KIM: Q. And it's also known that you 17:22
11 could use [REDACTED] [REDACTED]
12 [REDACTED]; 17:22
13 correct? 17:22

14 MR. JAFFE: Objection; form. 17:22

15 THE WITNESS: Yes. There are certainly 17:22
16 references in the public domain that discuss the 17:22
17 [REDACTED] [REDACTED]
18 [REDACTED] 17:23

19 MR. KIM: Q. For a LiDAR application; 17:23
20 correct? 17:23

21 A For a LiDAR application. 17:23

22 Q Okay. So the use of [REDACTED] [REDACTED]
23 [REDACTED] [REDACTED]
24 [REDACTED] that's not a Trade 17:23
25 Secret; right? 17:23

1 A No. The -- [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 17:23
5 Q Where are the [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 17:24
7 A I just misspoke and -- and mischaracterized 17:24
8 the Trade Secret. The Trade Secret really in this 17:24
9 case, Trade Secret 48, just talks about [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 17:24
11 THE VIDEOGRAPHER: 1053. 17:24
12 (Document marked Exhibit 1053 17:24
13 for identification.) 17:24
14 MR. KIM: So I've marked as Exhibit No. 1053, 17:24
15 which is a printout from a website. 17:24
16 Q You had mentioned that there are a lot of 17:24
17 vendors out there that sell [REDACTED] [REDACTED]
[REDACTED] including for LiDAR 17:24
19 applications. 17:24
20 Is this one example of that? 17:24
21 A Yes. 17:24
22 Q Okay. And you'll note that in the paragraph, 17:24
23 it says: 17:25
24 [REDACTED] [REDACTED] 17:25
[REDACTED]

1 CERTIFICATE OF REPORTER

2
3 I, ANDREA M. IGNACIO, hereby certify that the
4 witness in the foregoing deposition was by me duly
5 sworn to tell the truth, the whole truth, and nothing
6 but the truth in the within-entitled cause;

7 That said deposition was taken in shorthand
8 by me, a disinterested person, at the time and place
9 therein stated, and that the testimony of the said
10 witness was thereafter reduced to typewriting, by
11 computer, under my direction and supervision;

12 That before completion of the deposition,
13 review of the transcript [] was [x] was not
14 requested. If requested, any changes made by the
15 deponent (and provided to the reporter) during the
16 period allowed are appended hereto.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties to the said
19 deposition, nor in any way interested in the event of
20 this cause, and that I am not related to any of the
21 parties thereto.

22 Dated: 4/27/2017

23 

24 ANDREA M. IGNACIO,

25 RPR, CRR, CCRR, CLR, CSR No. 9830